

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

VL2955

\_\_\_\_\_  
In re

Chapter 11

Case No. 21-41367-LMM

893 4<sup>th</sup> Ave Lofts LLC

Debtor  
\_\_\_\_\_

x

**AFFIRMATION IN OPPOSITION TO OSC TO DISMISS CASE**

The Application of 893 4<sup>th</sup> Ave Lofts LLC, debtor and debtor in possession by its counsel, Vincent M. Lentini, Esq. ("VML"), respectfully alleges that:

1. On May 24, 2021, the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") with the United States Bankruptcy Court for the Eastern District of New York (the "Bankruptcy Court") and an order for relief was simultaneously entered therewith.

2. This case was filed pro-se on an emergency basis by the debtor without the Schedules.

3. Since that time, through a UCC security interest sale, on August 11, 2021, Secured Loan Holdings, LLC purchased all of the membership interests of the Debtor and became the sole member of the Debtor.

4. The Debtor continues to be in possession of its property and the management of its business affairs pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

5. The Debtor's is working on gathering together the necessary information and materials so that accurate Schedules may be prepared and filed herein.

6. The Debtor intends to file a plan and disclosure statement by the September 21, 2021, the date set for the filing of the same.

7. It is my understanding that the Court issued the OSC because debtor did not obtain counsel, file schedules did not pay filing fee etc.

8. We have either cured or in the process of curing these deficiencies.

9. I am in the process of contact the US Trustee to provide them with this update and guidance on how this matter should proceed.

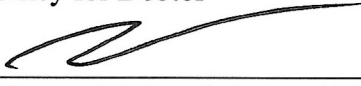
10. As such, the Debtor respectfully requests that the OSC to dismiss be withdrawn by the Court or denied or adjourned to a date in October 2021, this way the schedules, plan and disclosure statement can be prepared and filed.

11. No prior request for the relief sought herein has been made to this or any other court.

WHEREFORE, the Debtor requests that the OSC be withdrawn or denied.

Dated: August 20, 2021

Vincent M. Lentini, Esq.  
Attorney for Debtor

By:   
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